



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 13, 2023

BY ECF

The Honorable Mae A. D'Agostino
United States District Judge, Sitting by Designation
Northern District of New York
445 Broadway
Albany, New York 12207

Re: *United States v. Dionisio Figueroa*, 23 Cr. 161 (MAD)

Dear Judge D'Agostino:

On March 30, 2023, defendant Dionisio Figueroa was arrested and released on bond that included, among other conditions, he have no contact with "current or former employees of the U.S. District Court for the SDNY." (Dkt. #10 at 5). On April 6, 2023, the SDNY Clerk of Court requested that the parties modify Figueroa's bail conditions because he remains a court employee and may receive official correspondence from the Clerk of Court, and/or require assistance from Clerk's Office staff in Human Resources.

Based on this request, the Government respectfully moves that Figueroa's bond be modified to add that he have no contact with current or former SDNY employees, "except that he may receive official correspondence from the Clerk of Court and the Court's Human Resources Department; and he may communicate with the same regarding any official matters that are related to his employment and unrelated to facts of this case."

Prior to being relieved from this case, Figueroa's former counsel, Karloff Commissiong, Esq., agreed with this request. The Government has not yet made contact with Figueroa's new counsel from the Federal Defenders for the Northern District of New York but hopes to do so soon. Even so, because this motion is to relax Figueroa's conditions, and is made at the Clerk of Court's request, the Government is filing now, so as not to needlessly delay the Clerk's ability to send official correspondence to its employee.

Respectfully submitted,

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